

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

|                                      |   |                           |
|--------------------------------------|---|---------------------------|
| CATHERINE ALEXANDER,                 | ) |                           |
|                                      | ) |                           |
| Plaintiff,                           | ) |                           |
|                                      | ) | Case No: 3:18-cv-0966-SMY |
| v.                                   | ) |                           |
|                                      | ) | JURY TRIAL DEMANDED       |
| TAKE-TWO INTERACTIVE SOFTWARE, INC., | ) |                           |
| et al.,                              | ) |                           |
|                                      | ) |                           |
| Defendants.                          | ) |                           |

**PLAINTIFF'S MOTION TO FILE CERTAIN DOCUMENTS UNDER SEAL**

Plaintiff Catherine Alexander ("Plaintiff"), by and through her counsel and for her Motion to File Certain Documents Under Seal states:

1. On January 22, 2019, the Court issued a Stipulated Protective Order at Dkt. No. 111.
2. Pursuant to Section 9(a) of that Protective Order, "Any Party seeking to file any material under seal shall obtain leave from the Court to do so. The Party requesting leave shall submit the materials sought to be filed under seal to Chambers via e-mail. If the Court grants the Party leave to file under seal, the Party shall file unredacted papers under seal through ECF in conformity with the procedures set forth by the Clerk of Court."
3. Exhibits in support of Plaintiff Memorandum in Opposition to Defendants' Motion for Summary Judgment and Exhibit B (Dkt. Nos. 165, 165-4) and Plaintiff's Memorandum in Opposition to Defendants' Motion to Exclude the Testimony of Ryan Clark (Dkt. Nos. 168, 168-1, 168-2, 168-3, 168-4) contain confidential or highly confidential information as designated by the Defendants or as defined in the Stipulated Protective Order.
4. Plaintiff respectfully requests leave to file the following documents under seal:

| <b>Docket No.</b> | <b>Document Description</b>   | <b>Portion of Document</b> |
|-------------------|---|----------------------------|
| 165               | Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment                   | Highlighted Portions       |
| 165-4             | Exhibit B - Deposition Excerpt of Mark Little   | Full                       |
| 168               | Plaintiff's Memorandum in Opposition to Defendants' Motion to Exclude the Testimony of Ryan Clark | Highlighted Portions       |
| 168-1             | Exhibit 1 – Deposition of Ryan Clark  | Full                       |
| 168-2             | Exhibit 2 - Rebuttal Report of Ryan Clark   | Full                       |
| 168-3             | Exhibit 3 - TAKE-TWO_0001332 – WWE 2K Franchise Sales since Apr' 2015                             | Full                       |
| 168-4             | Exhibit 4 - TAKE-TWO_0000983 – WWE 2K Franchise Sales since Apr' 2015                             | Full                       |

WHEREFORE, Plaintiff respectfully requests that the Court grant leave for Plaintiff to file the aforementioned exhibits to Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment and Exhibit B and Plaintiff's Memorandum in Opposition to Defendants' Motion to Exclude the Testimony of Ryan Clark and Exhibits 1-4 under seal as identified above.

Dated: December 9, 2019

Respectfully submitted,

/s/ Anthony G. Simon

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon all counsel of record this 9<sup>th</sup> day of December, 2019 via the Court's CM/ECF system.

/s/ Anthony G. Simon